

Via ECFS

February 6, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Re: **WC DOCKET NO. 06-36**
EB-06-TC-060
CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006)

Dear Ms. Dortch:

Pursuant to the Commission's January 30, 2006 Public Notice, Pacific LightNet, Inc. hereby files a copy of its 2005 Annual CPNI Compliance Certification, as required by section 64.0009(e) of the Commission's rules.

Please let me know if you have any questions about this filing.

Sincerely,



James L. Lemberg
Corporate Secretary and
Vice President, Business Operations

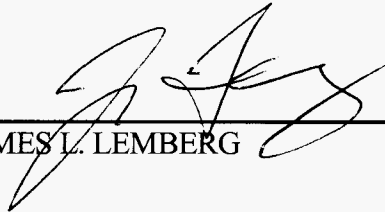
Cc: Byron McCoy (byron.mccoy@fcc.gov)
Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

PACIFIC LIGHTNET, INC.
CPNI COMPLIANCE CERTIFICATE

I, James L. Lemberg, hereby certify as follows:

1. I am Vice President – Business Operations, and Corporate Secretary, of Pacific LightNet, Inc. In this capacity, I have personal knowledge of Pacific LightNet's operating procedures concerning customer proprietary network information (CPNI).
2. I provide this certification for the calendar year ending December 31, 2005, in accordance with Commission rule 47 C.F.R. 64.2009(e) (together with such other rules contained at 47 C.F.R. 64.2001, et seq, as the same may be modified, amended or clarified, from time to time, collectively, the "CPNI Rules").
3. Pacific LightNet has established operating procedures, described in the attached Statement of Pacific LightNet's Operating Procedures, that are adequate to ensure compliance with the CPNI Rules.

Certified this 6th day of February, 2006.



JAMES L. LEMBERG

ATTACHMENT TO 2005 CPNI COMPLIANCE CERTIFICATE

Statement of Pacific LightNet, Inc.'s Operating Procedures

1. As a facilities-based competitive local exchange carrier serving primarily small to mid-sized businesses, Pacific LightNet does not use CPNI for marketing purposes. In particular, Pacific LightNet does not use, access, or disclose CPNI relating to customers and/or the telecommunications services that Pacific LightNet provides to customers for the purpose of its sales and marketing campaigns nor to conduct outbound marketing. Moreover, Pacific LightNet trains its employees not to use CPNI for marketing purposes. In addition, Pacific LightNet's employee handbook contains prohibitions against employees' disclosure of customer information. All employees must verify in writing that they have reviewed and understand the policies in the handbook. An employee violating Pacific LightNet's nondisclosure policy will be subject to disciplinary action, up to and including, termination. Prior to any future use of CPNI for marketing telecommunications services, Pacific LightNet will establish (i) a process for obtaining the status of a customer's CPNI approval prior to using the CPNI, and (ii) a supervisory review and approval process for any proposed outbound marketing request for customer approval.
2. Pacific LightNet does not provide CPNI to third parties. To the extent the incumbent local exchange carrier with whom Pacific LightNet is interconnected (Hawaiian Telcom) has access to Pacific LightNet's CPNI, the parties' interconnection agreement prohibits Hawaiian Telcom's further disclosure or use of CPNI for marketing purposes.